

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

DNV INVESTMENT PARTNERSHIP,)	
DALE MENARD, S. EUGENE)	
MATHIS JR., KENNETH A)	
GRINSPUN, ADDISON HOLDINGS LLC,)	
and CONTEXT DIRECT II LP,)	
ON BEHALF OF THEMSELVES AND)	
ALL OTHERS SIMILARLY SITUATED,)	
)	No. 2:14-cv-02232
Plaintiffs,)	
)	
v.)	
)	
SGM HOLDINGS LLC, SYNDICATED)	
GEO MANAGEMENT CORPORATION,)	
RICHARD FEATHERLY,)	
LAWRENCE FIELD, and)	
PREMIER NATURAL RESOURCES LLC,)	
)	
Defendants.)	

**CONSENT MOTION TO AMEND FIRST AMENDED COMPLAINT,
AMEND THE CAPTION, ACCEPT SERVICE, AND FOR
EXTENSION OF TIME TO RESPOND TO SECOND AMENDED COMPLAINT**

Defendants SGM Holdings LLC, Syndicated Geo Management Corporation, Richard Featherly, Lawrence Field, and Premier Natural Resources LLC, after consultation with plaintiffs, submit this Consent Motion to (1) allow plaintiffs to file a second amended complaint; (2) amend the caption; (3) accept service on behalf of all defendants; and (4) extend defendants' time to answer or otherwise respond to the Second Amended Complaint, all as set forth in greater detail below.

1. Defendants consent to an order pursuant to which plaintiffs shall file a Second Amended Complaint on or before May 26, 2014.

2. Defendants consent to an order amending the caption in this action to add Addison Holdings LLC and Context Direct II LP as plaintiffs; to add SGM Holdings LLC and Syndicated Geo Management Corporation as defendants; and to remove Regent Private Capital LLC, Regent Private Capital II LLC, and Charles Stephenson as defendants.

3. Schulman Blackwell LLP will accept electronic service of the Second Amended Complaint on behalf of all defendants.

4. Defendants' time to file an answer or otherwise respond to the complaint is extended to and including June 20, 2014.

By: /s/ J. Bennett Fox, Jr.

LUCIAN T. PERA (Tenn. BPR No. 11641)
J. BENNETT FOX, JR. (Tenn. BPR No. 26828)

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CERTIFICATE OF CONSULTATION

The undersigned certifies that counsel for defendants have consulted with counsel for plaintiffs and counsel for plaintiffs stated that plaintiffs consent to the relief requested herein.

/s/ J. Bennett Fox, Jr.
J. BENNETT FOX, JR.

CERTIFICATE OF SERVICE

The undersigned certifies that on May 22, 2014, a copy of the foregoing **Consent Motion To Amend First Amended Complaint, Amend The Caption, Accept Service, And For Extension Of Time To Respond To Second Amended Complaint** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ J. Bennett Fox, Jr.
J. BENNETT FOX, JR.